

1 ANDREW J. OGILVIE (SBN 57932)
2 MARK F. ANDERSON (SBN 44787)
3 CAROL M. BREWER (SBN 214035)
4 ANDERSON, OGILVIE & BREWER LLP
5 600 California Street, 18th Floor
6 San Francisco, California 94108-2711
7 Telephone: (415) 651-1950
8 Facsimile: (415) 956-3233
9 andy@aoblers.com
10 mark@aoblers.com
11 carol@aoblers.com

12 BALÁM O. LETONA 229642
13 LAW OFFICE OF BALÁM O. LETONA, INC.
14 55 River Street, Ste. 220
15 Santa Cruz, CA 95060
16 Telephone: (831) 421-0200
17 Facsimile: (831) 515-3114
18 letonalaw@gmail.com

19 Attorneys for Plaintiffs,
20 Roane Holman, Narcisco Navarro Hernandez, Miguel A. Alvarez
21 and all others similarly situated

22 UNITED STATES DISTRICT COURT

23 NORTHERN DISTRICT OF CALIFORNIA

24 ROANE HOLMAN, NARCISCO NAVARRO
25 HERNANDEZ and MIGUEL A. ALVAREZ on
26 behalf of all others similarly situated,

Case No. 11- cv-0180-CW

27 Plaintiff,
28 v.
29 EXPERIAN INFORMATION SOLUTIONS,
30 INC.

31 Defendant.

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I, Andrew J. Ogilvie, declare as follows:

1. I am one of the attorneys for the plaintiffs in this action.

2. Prior to filing this administrative motion I have communicated numerous times with Experian's counsel trying to resolve the discovery issues in this case. Most recently I asked whether Experian would agree to the appointment of a discovery master to oversee the discovery issues, but Experian refused.

3. **Exhibit A** is a copy of Experian's response to Plaintiffs' Third Request for Documents. I wrote to Experian's counsel at the end of December trying to resolve the discovery issues presented by Experian's objections, but Experian has not responded. A copy of my "meet & confer" letter is **Exhibit B**. Experian says it will send a written response tomorrow.

5. **Exhibit D** is a copy of Experian's Responses to Plaintiffs' Fourth Request for Documents, which was served on us a few days ago.

6. On December 8, 2011, I served Experian with plaintiffs' notice of deposition of the employees in its Membership Department who approved Finex to receive Experian's reports. About a week ago I received an email from Experian's lawyer telling me that it would not produce those witnesses for their depositions. On January 13, 2012, I received Experian's Objections to those depositions, which is **Exhibit E**.

I declare under penalty of perjury that the foregoing is true and correct. Executed this
18th day of January, 2012 at San Francisco, California.

/s/ Andrew J. Ogilvie
Andrew J. Ogilvie